

JUDGE DAVID GUADERRAMA

FILED

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

2015 SEP 30 PM 4:40

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WESTERN DISTRICT OF TEXAS

BY: 

DEPUTY

UNITED STATES OF AMERICA,

§

SEALED

§

INDICTMENT

§

Plaintiff,

§

Criminal No. EP-15-CR-

§

v.

§

COUNT 1: 18 U.S.C. § 1591 (a)(1), (a)(2),

§

(b)(2) and (c) – Sex Trafficking of

MICHELLE BOOTH (1),

§

Children

§

§

COUNT 2: 18 U.S.C. § 1594 (c) –

§

Conspiracy to Traffic Persons

§

and,

§

NOTICE OF GOVERNMENT'S

§

DEMAND FOR FORFEITURE

DENZEL WILLIAMS (3),

§

Also known as (a.k.a.) "T,"

§

§

Defendants.

§

**EP15CR1700**

THE GRAND JURY CHARGES:

COUNT ONE

(18 U.S.C. §1591(a)(1), (a)(2), (b)(2) and (c))  
(Sex Trafficking of Children)

Beginning on or about November 27, 2014 and continuing through and including on or about December 20, 2014, in the Western District of Texas and elsewhere, Defendants,

MICHELLE BOOTH (1),

  
DENZEL WILLIAMS (3),

a.k.a. "T"

in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, J.G., and did benefit financially and by

receiving anything of value from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person, J.G., knowing that J.G. would be caused to engage in a commercial sex act, as defined in Title 18, United States Code, Section 1591(e)(3), and after having a reasonable opportunity to observe J.G., and did knowingly and recklessly disregard the fact that J.G. had not attained the age of eighteen (18) years, all in violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2), (b)(2), and (c).

**COUNT TWO**  
**(18 U.S.C. § 1594(c))**  
**(Conspiracy To Sex Traffic Persons)**

Beginning on or about November 27, 2014 and continuing through on or about March 19, 2015 in the Western District of Texas and elsewhere, Defendants,

**MICHELLE BOOTH (1),**



**DENZEL WILLIAMS (3),**

**a.k.a. T**

together with others, both known and unknown to the Grand Jury, knowingly conspired, combined, confederated and agreed with each other and others known and unknown to the Grand Jury, to commit certain offenses and violate certain laws of the United States, to wit:

- a) To knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain persons, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination thereof, would be used to cause the person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1);
- b) To knowingly benefit, financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided,

obtained, and maintained by any means persons, in and affecting interstate and foreign commerce, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination thereof, would be used to cause the person to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591 (a)(2) and (b)(1);

- c) To knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means persons, knowing and in reckless disregard of the fact that the persons, had not attained the age of eighteen (18) years, and after having a reasonable opportunity to observe the persons, and knowing that the persons would be caused to engage in a commercial sex act as defined in Title 18, United States Code, Section 1591(e)(3), all in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2) and (c);
- d) To knowingly benefit, financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained by any means persons, in and affecting interstate and foreign commerce, knowing and in reckless disregard of the fact that the persons, had not attained the age of eighteen (18) years, and after having a reasonable opportunity to observe the persons, and knowing that the persons would be caused to engage in a commercial sex act as defined in Title 18, United States Code, Section 1591(e)(3), all in violation of Title 18, United States Code, Sections 1591(a)(2), (b)(2) and (c)

All in violation of Title 18, United States Code, Section 1594(c).

**NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE**  
(18 U.S.C. § 1594(d), 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

As a result of the foregoing criminal violations set forth in Counts One and Two of this Indictment, the United States of America gives notice to the Defendants,

**MICHELLE BOOTH (1),**



**DENZEL WILLIAMS (3),**

**a.k.a. T,**

of its intent to seek forfeiture, pursuant to 18 U.S.C. § 1594(d)(1), of any and all property, real and personal, that was used or intended to be used to commit or to facilitate the commission of the offenses, and pursuant to 18 U.S.C. § 1594(d)(2), 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), of any and all property, real and personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds obtained as a result of the offenses, for which the defendants are liable.

**Substitute Assets Provision**

If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

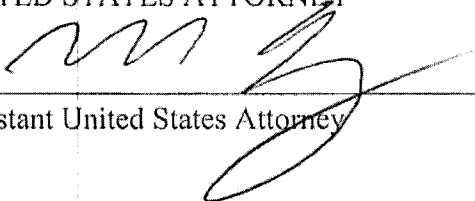
A TRUE BILL ORIGINAL SIGNATURE  
REDACTED PURSUANT TO  
E-GOVERNMENT ACT OF 2002

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GRAND JURY FOREPERSON

RICHARD L. DURBIN, JR.  
UNITED STATES ATTORNEY

By

  
Assistant United States Attorney